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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITE HERE LOCAL 2; SAN MATEO HOTEL
EMPLOYEES & RESTAURANT EMPLOYEES
WELFARE FUND; SAN MATEO HOTEL
EMPLOYEES & RESTAURANT EMPLOYEES
PENSION FUND; SHERRI CHIESA, JAMES
BEARD, HAL BOBROW, MIKE CASEY, THO
DO, and RICHARD ROMANSKI, Trustees of the
San Mateo Hotel Employees & Restaurant
Employees Welfare and Pension Funds,

Plaintiffs,

v.

SFO GOOD-NITE INN, LLC, a California
limited liability company; ERIC YOKENO, an
individual; and BANG JA KIM, an individual,

Defendants.

Case No. C07-02588 BZ

**STIPULATION RE
ADMINISTRATIVE MOTION
TO CONSIDER WHETHER
CASES SHOULD BE RELATED**

WHEREAS, on June 28, 2007, Plaintiffs UNITE HERE LOCAL 2 ("Union"); SAN MATEO HOTEL EMPLOYEES & RESTAURANT EMPLOYEES WELFARE FUND; SAN MATEO HOTEL EMPLOYEES & RESTAURANT EMPLOYEES PENSION FUND (together, "Trust Funds") SHERRI CHIESA, JAMES BEARD, HAL BOBROW, MIKE CASEY, THO DO, and RICHARD ROMANSKI, Trustees of the San Mateo Hotel Employees & Restaurant Employees Welfare and Pension Funds ("Trustees") filed a First Amended Complaint in this action and a Notice of Related Case;

WHEREAS, on July 18, 2007, Defendants SFO GOOD-NITE INN, LLC and BANG JA KIM filed an Answer to the FAC;

WHEREAS, the parties have conferred and agree that this case may be related to a case currently pending before the Honorable Martin J. Jenkins, case number C06-07335 MJJ, which was filed on November 28, 2006 by the National Labor Relations Board Regional Director of Region 20, Joseph Norelli, under Section 10(j) of the National Labor Relations Act [61 Stat. 149; 73 Stat. 544; 29 U.S.C. § 160 (j)]. That case involves a petition seeking injunctive relief pending final disposition of the Complaint and Notice of Hearing issued by the Nation Labor Relations Board against Defendant for engaging in unfair labor practices in violation of 8(a)(1), (3) and (5) of the National Labor Relations Act.

NOW THEREFORE, IT IS AGREED AND STIPULATED that the Court should consider and determine whether this case and case number C06-07335 MJJ are related.

Dated: August 1, 2007

The respective attorneys, by their signatures below, represent and warrant that they have the consent of their respective clients, have discussed this Stipulation and [Proposed] Order Granting Plaintiffs Administrative Motion to Consider Whether Cases Should Be Related and have the authority to bind their respective clients.

Dated: August 1, 2007

LEONARD CARDER, LLP

By: /s/ Christine S. Hwang
Matthew D. Ross
Christine S. Hwang
Attorneys for Plaintiffs

Dated: August 1, 2007

JORDAN LAW GROUP

By: /s/ Nanette Joslyn
Patrick Jordan
Nanette Joslyn
Attorneys for SFO Good-Nite Inn, LLC
and Bang Ja Kim